



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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MCAS EL TORO
SSIC NO. 5090.3.A

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JAN 28 2009

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Fellow Federal Facility Agreement (FFA) Representatives:

SUBJECT: CLOSURE OF MISCELLANEOUS SITE OF CONCERN (MSC) B3, FORMER MARINE
CORPS AIR STATION EL TORO, CALIFORNIA

The purpose of this letter is to document the closure strategy for Miscellaneous Site of Concern (MSC) B3 as discussed at the January 13, 2008 Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting. As you know, MSC B3 includes three former pits within the Former Crash Crew Training Area which overlies a portion of Installation Restoration Program (IRP) Site 16 (Enclosure 1). Consistent with previous BCT agreements, MSC B3 closure is handled within the Petroleum Corrective Action Program (PCAP) under the direct oversight of the California Regional Water Quality Control Board, Santa Ana Region (RWQCB).

In November 2008, the Navy issued a closure report for MSC B3 which recommended no further action. In a letter of January 5, 2009, the RWQCB stated, "We do not concur with the report's recommendation for closure and that the significant threat from total petroleum hydrocarbons gasoline and diesel range contamination has [not] been sufficiently reduced." In response to this letter, the Navy proposes excavation of petroleum impacted soil to remove the "significant threat" and to obtain closure on this site.

Based on a review of site conditions, the proposed MSC B3 petroleum corrective action of soil excavation would have short-term incidental impacts on two elements of the IRP Site 16 groundwater remedy, Monitored Natural Attenuation (MNA) with Institutional Controls (ICs), described in the July 2003 *Final Record of Decision (ROD) Operable Unit 3, IRP Site 16 Crash Crew Training Pit No. 2*,

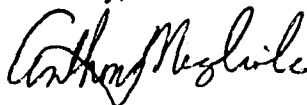
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Former Marine Corps Air Station El Toro, California and in the March 2006 *Final Remedial Design for Monitored Natural Attenuation with Institutional Controls Operable Unit 3, IRP Site 16 Crash Crew Training Pit No. 2, Former Marine Corps Air Station El Toro, California*. The two elements which would be temporarily impacted are six monitoring wells and the positive drainage required over the main pit area. Of the 18 monitoring wells in the IRP Site 16 network, 6 monitoring wells, 16_MW01, 16_MW06, 16_MW07, 16_MW16, 16_MPE1 and 16_VM1, would require decommissioning prior to soil excavation activities and subsequent replacement. The wells would be decommissioned in accordance with the BCT-concurred March 2008 *Final Work Plan, Destruction of Inactive Monitoring Wells at Selected Sites, Former Marine Air Corps Air Station El Toro, Irvine California*. The Navy would replace these wells upon completion of the petroleum corrective action; a separate abbreviated work plan would be provided for BCT review for this effort. A separate technical memorandum would also be issued to document site grading activities to restore positive drainage over the main pit area.

Finally, MSC B3 and IRP Site 16 are located within a carve-out slated for transfer this fiscal year and a Finding of Suitability for Transfer is under development. IRP Site 16 has received BCT concurrence on an operating properly and successfully (OPS) determination. As you know, an OPS determination approved by U.S. Environmental Protection Agency (EPA) is required to document that all remedial action necessary to protect human health and the environment has been taken and support the covenant required by Section 120(h)(3)(A)(ii)(I) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). The Navy considers that these short-term incidental impacts to the IRP Site 16 groundwater remedy (well destruction, replacement, and grading) will not compromise the OPS determination since the soil excavation activities under the PCAP will not affect the ICs nor the natural attenuation processes underway at the site and the monitoring wells and positive drainage will be expeditiously restored. The Navy would like to continue to work with RWQCB staff to immediately proceed with this petroleum corrective action.

Please provide your written approval of this strategy by February 4, 2009. Thank you for your cooperation and continued support. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Remedial Project Manager at (619) 532-0790.




Sincerely,

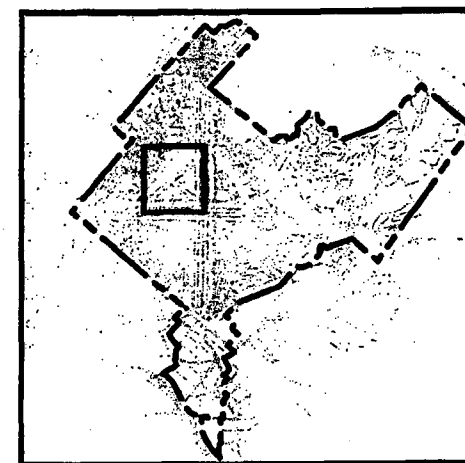


ANTHONY MEGLIOLA
Base Closure Manager
By direction of the Director

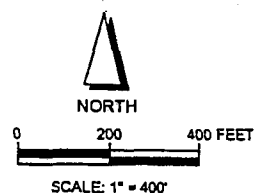
Enclosures: (1) Miscellaneous Site of Concern (MSC) B3 and Installation Restoration Program (IRP)
Site 16 Site Map

LEGEND

-  Installation Restoration Program (IRP) Site 16
-  IRP Site 16 Institutional Control Boundary
-  Miscellaneous Site of Concern (MSC) B3



KEY MAP



Carve-Out
I-F

IRP Site 16

MSC B3

ENCLOSURE 1 MISCELLANEOUS SITE OF CONCERN (MSC) B3 AND INSTALLATION RESTORATION PROGRAM (IRP) SITE 16 SITE MAP

Date: 01-09

Project No.
104766

Former MCAS
El Toro

Figure
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